

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION**

EDWARD BUTOWSKY,

Plaintiff,

vs.

MICHAEL GOTTLIEB, et al.,

Defendants

Case No. 4:19-CV-00180

AMENDED JOINT PROPOSED SCHEDULING ORDER

Pursuant to the Court's Order of December 12 (Doc. 185), Plaintiff Edward Butowsky and Defendants Cable News Network, Inc., Anderson Cooper, Gary Tuchman, Oliver Darcy, Tom Kludt, The New York Times Company, Alan Feuer, Vox Media, Inc., and Jane Coaston submit the attached Amended Joint Proposed Scheduling Order.

The BSF Defendants are unable to join in this proposed scheduling order because in the first filed litigation in D.C., Mr. Butowsky has requested a stay of discovery for 120 days based on his health condition, and we do not believe that he should be allowed to move his plaintiff case forward while seeking to stay his defense-side case in its tracks. We are also unsure, given his health status, whether Mr. Butowsky could move this case forward or be available for discovery before deadlines in this case arise that would require Mr. Butowsky's availability for discovery. Additionally, the BSF Defendants would ask for a longer schedule than other defendants because the BSF Defendants would be unable to effectively brief, for example, a motion to transfer before the Court resolves the BSF Defendants' Motions to Dismiss on First to File Grounds and on Personal Jurisdictional Grounds.

Respectfully submitted,

/s/ Ty Clevenger

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